

FACILITY COMPLIANCE INSPECTION REPORT

Division of Waste Management Solid Waste Section

UNIT	UNIT TYPE:												
Lined MSWLF	L	.CID		YW		Transfer		Compost		SLAS		COUNTY: Wilkes	
Closed MSWLF	Н	IHW		White goods		Incin		T&P		FIRM		PERMIT NO.: 97-03	
CDLF		e T&P / lection		Tire Monofill		Industrial Landfill	X	DEMO		SDTF		FILE TYPE: COMPLIANCE	

Date of Site Inspection: May 23, 2014 Date of Last Inspection: October 15, 2013

FACILITY NAME AND ADDRESS:

Louisiana-Pacific Corporation Industrial Solid Waste Landfill 1151 ABTCO Road North Wilkesboro, North Carolina 28659

GPS COORDINATES: N: 36.20102 W: 81.04109

FACILITY CONTACT NAME AND PHONE NUMBER:

Name: Roy P. Hart, EHS Manager

Telephone: (336) 696-3464 (o) or (336) 984-0249(m)

Email address: roy.hart@lpcorp.com

Fax: (336) 696-3412

FACILITY CONTACT ADDRESS:

Post Office Box 98 Highway 268 Roaring River, North Carolina 28669

PARTICIPANTS:

Roy Hart, EHS Manager Charles Gerstell, NCDENR-Solid Waste Section

STATUS OF PERMIT:

A Permit to Operate the Existing Landfill Unit and Permit to Construct a Horizontal Expansion was issued to Louisiana-Pacific Corporation on April 12, 2013. The Permit to Operate shall expire on December 28, 2014. If substantial construction does not begin within 18 months from the issuance date of the permit, then the permit to construct shall expire.

PURPOSE OF SITE VISIT:

Comprehensive Inspection

STATUS OF PAST NOTED VIOLATIONS:

N/A

OBSERVED VIOLATIONS

None

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be advised that pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

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ADDITIONAL COMMENTS

- 1. Louisiana-Pacific Corporation manufactures hardboard (construction) siding and operates a wood ash landfill located adjacent to the manufacturing facility.
- 2. This landfill is permitted to accept wood ash generated from the wood-fired boilers and zinc borate sludge from the facility's wastewater treatment plant.

Records Review:

- **3.** The Permit to Operate and operations plan were verified. Both documents were current and available upon request.
- **4.** The facility is required to maintain a record of the amount of solid waste received at the landfill unit, compiled on a monthly basis. Monthly reports were verified for October 2013 through April 2014. During this time, the landfill received a total of 13,097.21 tons of waste.
- 5. Groundwater monitoring was being performed semi-annually as required. Facility staff takes samples which are sent to Meritech, Inc. Environmental Laboratory for testing. Second semi-annual sampling for 2013 (performed August 13, 2013) and first semi-annual monitoring for 2014 (performed February 25, 2014) were verified.
- 6. In-house training is provided for all personnel involved with landfill operations. Training events had not yet commenced as of the date of the inspection. Mr. Hart stated in an e-mail dated May 30, 2014 that training of landfill personnel will start the week of June 2, 2014.

<u>Inspection of the Phase 2 Horizontal Expansion:</u>

- 7. Construction of the Phase 2 horizontal expansion had been completed since the last inspection.
 - The area designated for the Phase 2 horizontal expansion had been cleared, grubbed and seeded with good germination of seed.
 - Edge of waste markers had been installed around the newly constructed area.
 - Fire box #15 had been moved to the north side of the Phase 2 area. Mr. Hart stated that all associated piping to supply water to the fire box had also been constructed.
 - A gravel and rip rap filter ring had been installed at the inlet to the existing corrugated metal pipe. The device appeared to be adequately maintained at the time of inspection.

Inspection of the Existing Landfill Unit

- **8.** Inactive slopes were stable with native vegetation at the time of inspection.
- **9.** Multiple fire boxes equipped with hydrants and fire hoses were provided on top of the landfill to aid in fire control.
- 10. Yellow edge-of-waste markers were in place around the perimeter of the landfill.
- 11. The facility is approved to mix zinc borate sludge with ash for disposal within the landfill. The sludge and ash are mixed adjacent to an elevated concrete high wall where material is unloaded from trucks. The sludge to ash ratio is required to be an average of 2:1 with a maximum 3:1.
- **12.** A water hose is provided to allow for the application of water to ash during unloading of the waste at the designated area on the landfill.
 - During the inspection, water was observed leaking from the water hose washing a small amount of waste into the rip rap lined ditch that runs along the northern perimeter of the landfill. Attempts by Mr. Hart to stop the flow of water were unsuccessful. Mr. Hart immediately contacted facility staff to have the hose repaired. Maintenance staff arrived on site prior to the end of the inspection to repair the leak.
 - Mr. Hart was advised to ensure that the leak was properly repaired and have all waste removed from the rip rap lined ditch along the northern perimeter of the landfill.

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- An email from Roy Hart was received on May 23, 2014 explaining that the water leak had been repaired. Mr. Hart also explained that he had spoken to staff and left logbook instructions regarding not allowing water to run while the hose was not in use and that leaks must be immediately responded to.
- An additional email from Roy Hart was received on May 30, 2014 which provided a series of photographs and a narrative detailing the steps taken to remediate the waste deposited into the rip rap lined ditch along the northern perimeter of the landfill. Photos appeared to show that waste had been removed from the ditch and fresh rip rap provided. Mr. Hart explained in his e-mail that two berms and silt fence had been constructed to ensure that ash that might be carried by stormwater would be captured before it could exit the footprint of the landfill. Mr. Hart explained in his correspondence that this area will be monitored to ensure that the berms function as intended while not resulting in ponding on the landfill.
- 13. Diversion berms were provided along the edge of the waste area to direct flow to the riser basin located on the east side of the landfill. A corrugated plastic pipe is attached to the barrel of the basin to carry flow to stable ground beyond the toe of the landfill.
- **14.** The riser basin appeared to be well maintained at the time of inspection.
- **15.** During the previous inspection, a significant rut was observed at the inlet of the slope drain located at the southwest corner of the landfill. Inspection of the facility on May 23, 2014 found this area had been repaired.
- 16. Trees and tall, woody vegetation had been removed from the landfill since the last inspection.
- 17. The site is secured by a gate and access granted via scale house personnel.
- **18.** The facility had proper signage.
- 19. All access roads were of all-weather construction and well maintained.
- **20.** No unacceptable waste streams were observed.

Please contact me if you have any questions or concerns regarding this inspection report.

Charles T. Gerstell

Environmental Senior Specialist

Charles T. Hutel!

Regional Representative

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Phone: (704) 235-2144

Copies: Jason Watkins, Western District Supervisor Sarah M. Rice, Compliance Officer